## **EXHIBIT 1**

## In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION

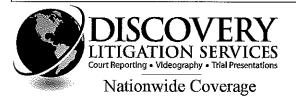
## VIDEOTAPED DEPOSITION OF SCOTT BUTLER

February 05, 2015



100 Mayfair Royal 181 Fourteenth Street Atlanta, GA 30309 404.847.0999

1	Q.	Where are the three main locations?
2	A.	St. Thomas Midtown, St. Thomas West and
3	Skyline Ho	spital.
4	Q.	Now, it was on the campus of St. Thomas
5	West where	the epidural and ster epidural steroid
6	injections	were given that's the subject of this
7	lawsuit; i	s that correct?
8	A.	Yes.
9	Q.	Where are the six satellite locations that
10	you mentioned?	
11	A.	Clarksville, Hopkinsville, Bowling Green,
12	Summit, Columbia. How many is that? Is that six?	
13	Q.	I wrote down five.
14	A.	Okay. And then Franklin.
15	Q.	Okay.
16	A.	And then one more, Columbia.
17	Q.	Thank you. Who is the president of Howell
18	Allen Clinic?	
19	A.	Greg Lanford.
20	Q.	He was the president back in 2011 and 2012;
21	is that co	rrect?
22	A.	Yes.
23	Q.	Do you hold any official titles with St.
24	Thomas Outpatient Neurosurgical Center?	
25	A.	I'm a board member.



NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION VIDEOTAPED DEPOSITION OF SCOTT BUTLER on 02/05/2015

Page 36

1	Q. And it's an e-mail that you sent on October	
2	the 9th, 2012; is that right?	
3	A. Yes.	
4	Q. And the subject is "Two things"; is that	
5	correct?	
6	A. Yes.	
7	Q. Could you read into the record the two	
8	things that you e-mailed to Ms. Rudolph.	
9	A. "No. 1, our group would like to buy lunch	
10	for the ER staff tomorrow. Who can I talk to about	
11	coordinating this effort? No. 2, Standard has a great	
12	idea. He would like for St. Thomas to have a day of	
13	prayer for the patients and families affected by the	
14	meningitis outbreak. Good PR move."	
15	Q. Now, Standard refers to Dr. Standard; is	
16	that correct?	
17	A. Yes.	
18	Q. And is he one of the owners of Howell Allen	
19	Clinic?	
20	A. Yes.	
21	Q. And when did you decide that having St.	
22	Thomas organize a day of prayer for the patients and	
23	families affected by the meningitis outbreak would be	
24	a good PR move?	
25	A. I assume when I sent the e-mail.	

